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EXHIBIT D

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU, INC., CAMERON WINKLEVOSS, TYLER WINKLEVOSS, AND DIVYA NARENDRA,	)	CIVIL ACTION NO. 1:07-CV-10593-DPW
Plaintiffs,	)	
v.	)	**JURY TRIAL DEMANDED**
FACEBOOK, INC., MARK ZUCKERBERG, EDUARDO SAVERIN, DUSTIN MOSKOVITZ, ANDREW MCCOLLUM, AND THEFACEBOOK LLC,	)	
Defendants.	)	

ERRATA TO PLAINTIFFS' FIRST AMENDED COMPLAINT

Plaintiffs ConnectU, Inc., Cameron Winklevoss, Tyler Winklevoss, and Divya Narendra (collectively "Plaintiffs") submit the following Errata to Plaintiffs' First Amended Complaint filed August 8, 2007. In the time crunch of finalizing the First Amended Complaint, an unexplained paragraph numbering change occurred after cross-references had been inserted. This change caused many of the cross-references to be incorrect by one number. The chart below ("Corrections to Cross References/Citations") identifies and corrects all previously incorrect cross-references. Plaintiffs have also identified additional citation errors, and other errors, which are also corrected in the charts below ("Typographical Corrections" and "Corrections to Citations to Exhibits"). In addition, Plaintiffs provided the incorrect documents for the following Exhibits: Ex. 67, Ex. 76, and Ex. 81 and failed to provide two Exhibits. Attached to this Errata are the correct documents for Ex. 76 and Ex. 81. Ex. 67 is confidential and, therefore, Plaintiffs will deliver separately by hand to the court the correct documents for

Ex. 67 along with new Ex. 84 and new Ex. 85, which are also confidential. Ex. 84 is a true and correct copy of Facebook Defendants' Supplemental Response to Plaintiff's First Set of Interrogatories, Interrogatory No. 18 and Ex. 85 is a true and correct copy of an email dated December 1, 2003 from HARVARDconnection to Mark Zuckerberg, bearing bates number FACE002497. Attached to this Errata are the correct documents for filing. Plaintiffs apologize for these errors and respectfully request that the Court accept this Errata.

At the Court's request, Plaintiffs will file a corrected First Amended Complaint incorporating the following changes. Plaintiffs could do so in redline form so that such changes would be clearly visible.

Corrections to Cross-References/Citations

Paragraph	**Line**	**Add to citation:**	**Replace cross-reference/citation with:**
20	5		"*Id.* at ¶ 16"
46	5		¶¶ 49-66.
46	7		¶¶ 66, 142
84	5		¶¶ 61-77
92	1		¶¶ 57-58, 62, 65-68, 70, 72, 74, 77-78
101	1		¶¶ 104-107, 111, 113-115, 117, 119, 121-122, 124, 126, 128-134
102	4		¶¶ 74, 106-107, 111, 113-115, 117, 119, 121-122, 128, 131-133
102	6		¶¶ 106-107, 113-115, 117, 119, 121, 128, 131-132
102	7	Add "November 24, 2003" among the dates listed on which Zuckerberg made "material oral statements"	¶¶ 74, 111, 122, 133

Paragraph	**Line**	**Add to citation:**	**Replace cross-reference/citation with:**
102	10		¶¶ 42-87
104	1		¶¶ 53-66
105	3	¶ 36	
105	6	¶¶ 65, 72, 74, 78	
126	2		¶ 282
142	12		¶¶ 131-133
142	15		¶¶ 118, 124, 126, 129-130, 218, 282
145	6		¶¶ 118, 124, 126, 129-130, 218, 282
145	10		¶¶ 106-107, 113-115, 117, 121, 128
145	11		¶¶ 74, 111, 122, 133
146	9		¶ 250
146	17		¶¶ 74, 106-107, 111, 113-114, 117, 122, 128, 133
147	1		¶¶ 74, 101-146
147	3		¶¶ 43-87
152	8		¶¶ 55-79
153	1		¶¶ 101-147
165	1		¶¶ 45-87, 101-147
173	1		¶¶ 45-87, 101-147
177	2		¶¶ 36, 53-59, 61, 63-65, 67, 69, 72-76, 78, 136
178	3		¶¶ 61-62, 67-68, 70, 77
184	4		¶ 36
192	6		¶¶ 53-79
195	4		¶¶ 25, 36, 40, 186-193
200	14		¶¶ 101-147
201	2		¶¶ 174-200
204	2		¶¶ 174-200
218	2		¶ 124
219	4		¶¶ 35, 71, 118, 124, 126
234	4	¶¶ 180, 207-233	
239	3		¶¶ 36, 180-200, 207-233
248	2		¶ 57
250	2		¶ 81

Paragraph	**Line**	**Add to citation:**	**Replace cross-reference/citation with:**
252	2		¶¶ 124, 218
253	2		¶ 209
254	4		¶¶ 13, 124, 207-223
257	4		¶ 146
272	3		¶¶ 74, 104-107, 111, 113-115, 117, 119, 121-122, 128, 131-133
273	3		¶¶ 53-66
273	8		¶¶ 36, 56-58, 63-69, 74-76
280	2		¶¶ 124, 218
281	2		¶¶ 124, 218
289	11		¶¶ 13, 207-239, 280-281
290	1		¶¶ 272-286
293	5		¶¶ 25, 39-40, 186-193
300	2		Replace “email exchange described in ¶¶ 53, 65, 70, 74, 76-77” with “emails described in ¶¶ 53, 63, 77”
307	2		¶¶ 53-66
307	4		¶¶ 71-85
308	4		¶¶ 65-68, 70, 72, 74, 77-78
309	4		¶¶ 74, 106-107, 110-111, 113-115, 117, 119, 121-122, 128, 132-133
317	6		¶¶ 35, 118, 124, 126, 129-130, 218, 282
329	3		¶¶ 13, 19-21, 35-36, 124, 180, 209-211, 217-220, 224-229
330	1		¶¶ 13, 19-21, 35-36, 124, 139, 180, 184, 216-223, 234-239, 252, 254-261, 287-289, 292-293
331	1		¶¶ 13, 35-36, 180, 184, 207-215, 234-

Paragraph	**Line**	**Add to citation:**	**Replace cross-reference/citation with:**
			239, 253-261, 287-288, 292-293
332	1		¶¶ 13, 35-36, 130, 180, 184, 234-239, 287-288, 292-293

Typographical Corrections

Paragraph	**Line**	**Correction**
25	3	Replace: " . . . to join a social network specific to their institution that would be part . . ." with " . . . to join a social network specific to their institution, that would be part . . ."
36	4	Add: "and trade secret described in detail in Ex. 1a" after "Specifically, such Defendants incorporated the Harvard Connection ideas" and before ",which the Founders disclosed to Zuckerberg, into the facebook.com website."
37	3	Delete: "In fact, the Founders only learned about thefacebook.com by reading about it in the Harvard *Crimson*."
75	4	Replace: "viwed" with "viewed"
81	1	Delete: "the" before "Cameron Winklevoss"
102	3	Add: "18th and 24th after "17th " and before "in 2003," Delete: "19th, and 22nd" Add: "and" after "12th" and before "14th"
105	1	Replace: "inot" with "into"
109	3	Add: ")" after "C004579" and before the "."
110	1	Replace: "On the evening of

Paragraph	**Line**	**Correction**
		November 24, 2003 . . .” with “On the morning of November 2**5**, 2003 . . .”
145	9	Delete: “19th, and 22nd” Add: “and” after “8th” and before “12th”
169	6	Delete: “the” before “ConnectU”
227	11	Add: “,” after “falsely”

Corrections to Citations to Exhibits

Paragraph	**Line**	**Replace Exhibit citation with:**
5	10	(Ex. 1, C011285-335)
18	2	(Ex. 84)
124	3	(Ex. 37, TFB000086)
145	11	(Ex. 53, HU00059-61)
190	3	(Ex. 57, FACE000130-31)
271	8	(Ex. 85, FACE002497)
300	6	(Ex. 9, C004632-33, Ex. 15 C004839)
304	3	(Ex. 53, HU000059)
317	5	(Ex. 17, FACE002243-44)
317	9	(Ex. 53)

Dated: August 17, 2007

Respectfully submitted,

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